

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

NOV 20 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
) CC Docket No. 95-155
Toll Free Service Access Codes)

AMERITECH REPLY

DOCKET FILE COPY ORIGINAL

The Ameritech Operating Companies (Ameritech) respectfully submit this reply to comments in the above-captioned proceeding. Ameritech's initial comments set forth in detail Ameritech's positions on the many issues raised in the Notice of Proposed Rulemaking (the Notice). This reply focuses on three issues only: (1) the Commission's proposal to require that, by February 1997, all local exchange carrier (LEC) switches be equipped with the software necessary to support all currently-reserved toll free codes; (2) treatment of so-called vanity numbers and, in particular, the extent to which 800 service subscribers should be able to obtain the 888 number corresponding to their 800 number; and (3) the role of Database Services Management, Inc. (DSMI) in administering the SMS/800 database.

A. The Commission Should Not Require LECs to Deploy
Software Needed for all Toll Free Codes by February 1997

One of the Commission's many proposals for ensuring that an adequate supply of toll free numbers remains available is to require that, by February 1997, all LEC switches be capable of supporting all toll free codes reserved by the industry in January 1995. These codes include 888, 877, 866,

No. of Copies rec'd 019
List ABCDE

and so on, to 822. Out of the more than 100 comments filed, only a few commenters support this proposal.¹ Ameritech submits that this lack of support underscores that the proposal is both unnecessary and unwarranted.

In proposing the February 1997 deployment deadline, the Commission states: "[s]ince the major switch vendors have already committed to developing the software and, in many cases, have already developed the software necessary to support all of the reserved toll free codes, we do not anticipate any technical obstacles to this proposal."² Ameritech's comments point out that this statement is incorrect, that Ameritech's largest switch vendors have not yet committed to developing the software needed for all toll free codes. Other commenters report that they too have not received commitments from their switch vendors for the software necessary for all toll free codes.³ Because the February 1997 date wrongly assumes software development commitments that have not been made, and may not be possible to make, the Commission cannot adopt this proposal.

Ameritech also notes in its comments that the deployment of all currently designated toll free codes would require significant changes to the SMS/800 system. The precise nature of these changes has not yet been

¹ See MCI Comments at 20; LCI International, Inc. Comments at 3; Telecommunications Resellers Association Comments at 14; and Paging Network, Inc. Comments at 5.

² Notice at para. 29.

³ SWBT Comments at 14-15; National Telephone Cooperative Association Comments at 2-3; BellSouth Comments at 11-12; PacTel Comments at 8; GTE Comments at 4-6; SNET Comments at 2. See also AT&T Comments at note 27 (acknowledging that further switch software releases would be required to implement codes other than 888 and 877 for switched without AIN software).

determined. It is therefore impossible to assess at this time whether these changes could be implemented by February 1997. Thus, even if the switch requirements the Commission proposes could be made by February 1997, it is not clear that making them would serve any purpose since the corresponding SMS/800 changes might not be ready at that time.

Apart from the fact that it may not be technically possible to meet the Commission's proposed February 1997 deadline for switches or for SMS/800 changes, there are other compelling reasons why the Commission should not establish specific dates by which LECs must implement the switch software needed for all toll free codes. First, it is inappropriate for the Commission to micromanage network deployment decisions. The Commission has neither the expertise nor the information to make decisions about how LEC networks are best designed and constructed, and it should not purport to make such decisions unless there are compelling and overriding public policy reasons to do so. Those reasons do not exist here. Rather, LECs have every incentive to upgrade the switches as necessary to accommodate all toll free traffic. Indeed, if they do not, they stand to lose significant access revenues.⁴

Second, the February 1997 deadline the Commission proposes is both arbitrary and unreasonable. There are approximately 8 million numbers in each toll free code. During the height of the "run" on 800 numbers, the

⁴ While special measures were required to ensure premature exhaust of 800 numbers, for a number of reasons, those circumstances are not likely to repeat themselves in the future. For one thing, no one could have predicted the "run on numbers" that attended the announcement that the 800 code was nearing exhaustion. The industry will be far more ready to prevent and address any similar "run" that occurs in the future. Second, it is unlikely that a similar "run" would occur in any case, since the 800 code has unique value as the exclusive toll free code for the past thirty years. Other toll free codes are not likely to acquire similar value and, therefore, are not likely to precipitate a similar reaction when they approach exhaust.

highest weekly consumption rate was a little over 100,000 numbers. Even assuming, arguendo, that this consumption rate became the norm for 888 numbers, and that 15% of all 888 numbers were reserved prior to the deployment of 888 access, it would take at least 60 weeks for 888 numbers to reach exhaustion. Yet the Commission proposes to require LECs to deploy software not only for 877 access, but for 866, 855, 844, 833, and 822 access – all within 48 weeks of 888 implementation. There is no reason for such an overly-ambitious deployment schedule. On the contrary, the Commission's proposal would be a prescription for wasteful, excess capacity and unnecessary expense.

In its comments, Ameritech notes that its vendors have made available the software to accommodate 888 and 877 access. Ameritech is in the process of deploying this capability and believes that other LECs are doing the same. This capability should be more than sufficient to accommodate all reasonably foreseeable toll free service needs for at least a few years, particularly given the measures proposed in this Notice with respect to the administration of toll free numbers. Indeed, in the unlikely event this was not the case, it would be incumbent upon the Commission to take measures to control the consumption of numbers, rather than ordering the deployment of additional codes that would undoubtedly exhaust almost immediately.

B. The Commission Should Establish Rules to Protect Subscribers with Vanity Numbers While Preventing Others From Depleting the Supply of 888 Numbers by Claiming their 800 Number in the 888 Code.

In its comments, Ameritech opposed measures to identify so-called "vanity numbers" and to accord subscribers with such numbers special preferences with respect to the corresponding 888 numbers. Ameritech stated that the only practical approach would be to assign 888 numbers on a first-come, first-served basis. After reviewing the comments and further considering the matter, Ameritech believes that a first-come, first-served reservation process for all 888 numbers would not serve the public interest. Ameritech explains below the basis for this conclusion and sets forth a better alternative.

Underlying Ameritech's initial opposition to protective measures for vanity numbers, and its support for a first-come, first-served reservation process, was Ameritech's belief that it would be impossible to identify which 800 numbers were vanity numbers and which were not, particularly given the broad definition of vanity numbers offered in the Notice. Ameritech was concerned that, without the ability to define a limited class of vanity numbers, any measures the Commission took would be so broad in scope as to hasten significantly the depletion of 888, and subsequently other toll free codes.

Ameritech now believes that its position was flawed. Indeed, Ameritech believes that a pure, first-come, first-served approach for all 888

reservations would neither help prevent premature exhaust of 888 numbers nor best protect the interests of subscribers with vanity numbers.

Perhaps the key deficiency of a pure, first-come, first-served approach is that it fails to ensure that toll free numbers are used efficiently. Subscribers can reserve their 800 number in the 888 code if for no other reason than to reduce the incidence of misdialed calls or to hedge against consumer confusion resulting from the deployment of a new toll free code. Indeed, because the "cost" of obtaining a toll free number is minimal, many 800 service subscribers will have every incentive to reserve their 800 number in the 888 code, even if they have no real need for an additional number. In this respect, a first-come, first-served system is no more likely to protect against the premature exhaust of 888 numbers than would a system that gave all 800 service subscribers a right-of-first-refusal. On the contrary, the only difference between a right-of-first-refusal system and a pure, first-come, first-served system is that the former guarantees subscribers the rights to their 888 number, while the latter system pits them in a race with other subscribers and RespOrgs to claim the number.

A better approach -- one that protects against the premature depletion of toll free codes, while accommodating the interests of some subscribers in protecting their considerable investment in their 800 number -- is to prohibit most 800 service subscribers from obtaining their 800 number in the 888 code, while establishing a limited right-of-first-refusal for other subscribers. To implement this approach, Ameritech proposes that each RespOrg be permitted to identify up to ten percent of its 800 numbers as vanity numbers. Subscribers with those numbers would be given a right-of-first-refusal to the

corresponding 888 number. Other subscribers would be prohibited from obtaining the 888 number corresponding to their 800 number.⁵

Allowing ten percent of 800 service subscribers to obtain their corresponding 888 number would not significantly drain the reserves of 888 numbers. At the same time, this measure should ensure that subscribers whose numbers are most valuable do not suffer undue harm from the opening of a new toll free code. Ameritech notes in this regard that only about five percent of 800 service numbers are listed in 800 directory assistance.⁶ While undoubtedly some vanity numbers are not listed in directory assistance service, Ameritech believes it is reasonable to assume that the vast majority of them are. Indeed, to the extent vanity numbers have special value, it is because those numbers have been heavily advertised and promoted to mass consumer markets. It seems self-evident that the vast majority of such numbers would be listed in 800 directory assistance, that businesses that invest heavily in promoting their 800 number would take the very basic step of a directory assistance listing. Since, as noted, only about five percent of 800 numbers are listed in directory assistance service, no more than ten percent of 800 numbers should be protected as vanity numbers.

⁵ Ameritech recommends that certain 800 service subscribers be accorded a right-of-first-refusal to their 888 number because of the unique role 800 service has played in the business world. Because 800 calls are free to the caller, and because 800 service subscribers have been able to choose virtually any number they want, without regard to geographic area codes and NXXs, 800 service has become a particularly important and unique marketing tool. Moreover, many 800 service subscribers who have invested heavily in promoting their 800 number could not have foreseen that a new toll free code would have to be opened so quickly. Therefore, any action the Commission takes to protect certain 800 service subscribers should in no way establish a precedent that subscribers to other services, such as 900 service, 500 service, or plain old telephone service (POTS), have similar interests in their telephone numbers that warrant protection. If the Commission does not make this clear, administration of these other services, particularly POTS after local number portability, would be all but impossible.

⁶ 800 Users Coalition Comments at 16-17.

Ameritech believes, further, that each RespOrg should be responsible for designating which of its 800 service numbers should be treated as a vanity number -- up to a maximum of 10% of its total numbers. RespOrgs are in the best position to assess the value that their subscribers' 800 numbers have acquired and to protect the numbers that are most valuable. While undoubtedly RespOrgs will protect more heavily used numbers before they protect less frequently used numbers, this is not necessarily inappropriate, since numbers that account for the most traffic are more likely to have intrinsic value and warrant protection than other numbers. In any event, Ameritech is aware of no better solution for identifying a limited set of numbers to be given protection, and the alternatives of protecting all numbers or no numbers are unsatisfactory. Therefore, while recognizing that this may not be a perfect solution, Ameritech believes it is the best alternative available.

Ameritech emphasizes that a key to this proposal is prohibiting subscribers not designated by their RespOrg for protection from reserving their 800 number in the 888 code. This measure -- or some other measure that will deter subscribers from reserving the corresponding 888 number unless they have a substantial need for that number is essential to ensuring the efficient management of toll free numbers as new toll free codes are opened.

C. It is Unnecessary to Transfer DSMI's Functions to a Third Party

In its comments, Ameritech argued that DSMI should be allowed to continue performing its current SMS/800 functions. It explained that DSMI currently serves two purposes: assisting the BOCs in fulfilling their FCC-mandated obligation of tariffing SMS/800 access, and helping the BOCs to manage the SMS/800 database by, for example, serving as an industry interface for requested software changes to the SMS. It argued that designating Lockheed IMS as administrator of the Number Administration and Service Center addresses any concerns regarding discrimination or access to sensitive information, and it noted that no complaint has ever been filed alleging that DSMI has discriminated or otherwise been unresponsive to the industry as a whole in the performance of its functions. Other commenters echo the sentiment that DSMI is performing its responsibilities efficiently and in an even-handed, fair manner.⁷

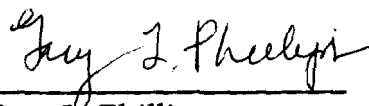
Although Ameritech believes that the transfer of DSMI functions to a neutral third party is unnecessary, Ameritech wishes to emphasize its continuing support for the Commission's initiative to transfer administration of the North American Numbering Plan to an independent administrator. Ameritech believes that some parties who support the transfer of DSMI functions are under a mistaken impression as to exactly what DSMI's functions are. These functions, Ameritech believes, do not implicate the Commission's interest in transferring number administration

⁷ AirTouch Paging Comments at 17; Scherers Communications Group Comments at 19.

responsibilities to a neutral third party because DSMI does not play any role in the administration or assignment of 800 numbers or 800 NXXs.

Nevertheless, if the Commission concludes that a transfer of DSMI's functions is integral to its overall policies on numbering matters, Ameritech would not oppose a separate proceeding to address how to accomplish such a transfer. At a minimum, any such proceeding would have to address precisely which of DSMI's responsibilities were being transferred and how to accommodate the legitimate interest of the BOCS in protecting assets and intellectual properties that currently support the SMS/800 data base.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Gary L. Phillips". The signature is written in dark ink and is positioned above a horizontal line.

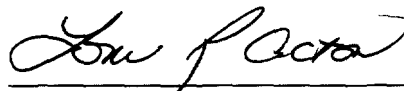
Gary L. Phillips
Counsel for Ameritech
1401 H Street, N.W. Suite 1020
Washington, D.C. 20005
(202) 326-3817

November 20, 1995

CERTIFICATE OF SERVICE

I, Toni R. Acton, do hereby certify that a copy of the foregoing Ameritech Reply has been served on the parties listed on the attached service list, by first class mail, postage prepaid, on this 20th day of November, 1995.

By:

A handwritten signature in cursive script, appearing to read "Toni R. Acton", written over a horizontal line.

Toni R. Acton

Colleen L. Boothby, Esq.
Laura F.H. McDonald, Esq.
Levine, Blaszak, Block & Boothby
Attorneys for 800 Users Coalition
1300 Connecticut Avenue, NW
Suite 500
Washington, DC 20036

Susan Drombetta
Manager - Rates and Tariffs
Scherers Communications Group, Inc.
575 Scherers Court
Worthington, OH 43085

Gordon N. Bloom
Vice President
Information Technology
Roadway Package Systems, Inc.
P.O. Box 108
Pittsburgh, PA 15230

Glenn B. Manishin
Christy C. Kunin
BLUMENFELD & COHEN
Attorneys for NEXTLINK, Inc.
1615 M Street, NW
Suite 700
Washington, DC 20036

Eric Fishman
Fletcher, Heald & Hildreth, PLC
Attorney for TLDP Communications, Inc.
1300 North 17th Street
11th Floor
Rosslyn, VA 22209

W.E. Miller, Jr.
President
Telecompute Corporation
1275 K Street, NW
Suite G-9
Washington, DC 20005

Wayne C. Rapp
Vice President
Crestar Bank
7818 Parham Road
Richmond, VA 23294

Glenn S. Richards
Fisher Wayland Cooper Leader &
Zaragoza, L.L.P.
Attorney for American Telegram
Corporation
2001 Pennsylvania Avenue, NW
Suite 400
Washington, DC 20006

John V. Kenny
President/Chief Operating Officer
U.S. Strategies Corporation
Attorney for Charter Medical
Corporation
1055 N. Fairfax Street
Suite 201
Alexandria, VA 22314

Joe D. Edge
Sue W. Bladek
Elizabeth A. Marshall
Drinker, Biddle & Reath
Counsel for Puerto Rico Telephone
Company
901 Fifteenth Street, NW, Suite 900
Washington, DC 20005

Glen A. Payne
Senior Vice President, Secretary &
General Counsel
Invesco Funds Group, Inc.
7800 East Union Avenue
Denver, CO 80237

Joel DeFabio
Attorney at Law
2121 Ponce de Leon Blvd
Suite 430
Coral Gables, FL 33134

Matthew O'Brien, President
Linda Hamilton, Director
Communications Managers Association
1201 Mt. Kemble Avenue
Morristown, NJ 07960-6628

Mr. Joe Wiseman
Senior Analyst
Wise Telecommunications
P.O. Box 4615
Lafayette, LA 70502

Adrienne J. Melillo
Manager Operations
Network Telephone Services, Inc.
6233 Variel Avenue
Woodland Hills, CA 91367

Loretta J. Garcia
Donald J. Elardo
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Mark Stachiw
AirTouch Paging
Three Forest Plaza
12221 Merit Drive
Suite 800
Dallas, TX 75251

Carl W. Northrop
Attorney for Airtouch Paging
Bryan Cave LLP
700 Thirteenth Street, NW
Suite 700
Washington, DC 20005

Mary McDermott
Linda Kent
Charles D. Cosson
U.S. Telephone Association
1401 H Street, NW
Suite 600
Washington, DC 20005

Genevieve Morelli
Vice President and General Counsel
The Competitive Telecommunications
Association
1140 Connecticut Avenue, NW
Suite 220
Washington, DC 20036

Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti,
LLP
Counsel to Direct Marketing Association
1201 New York Avenue, NW
Suite 1000
Washington, DC 20005

Christopher G. McCann
Vice President
1-800-Flowers, SM, Inc.
1600 Stewart Avenue
Westbury, NY 11590

Mark J. Golden
Vice President of Industry Affairs
Personal Communications Industry
Association
1019 19th Street, NW
Suite 1100
Washington, DC 20036`

D. Kelly Daniels
Bradley W. Prentiss
Telco Planning, Inc.
808 The Pittock Block
921 S.W. Washington Street
Portland, Oregon 97205

Jeffrey D. Knowles, Esq.
Gary D. Hailey, Esq.
Venable, Baetjer, Howard & Civiletti
Counsel to NIMA International
1201 New York Avenue, NW
Washington, DC 20005

Richard S. Whit
Director, Regulatory Affairs
Worldcom, Inc.
d/b/a LDDS WorldCom
1120 Connecticut Avenue, NW
Suite 400
Washington, DC 20036

Lisa M. Zaina
General Counsel
OPASTCO
21 DuPont Circle, NW
Suite 700
Washington, DC 20036

Charles H. Helein
Helein & Associates
Attorneys for Americas Carriers
Telecommunications Assn.
8180 Greensboro Drive
Suite 700
McLean, VA 22102

Rachel J. Rothstein
Deena M. Mistretta
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Gregory M. Casey, Esq.
Victoria A. Schlesinger, Esq.
Telemation International, Inc.
6707 Democracy Blvd.
Suite 800
Bethesda, MD 20817

Catherine Wang
William B. Wilhelm, Jr.
Swidler & Berlin
Attorney for Enterprise Rent-a-Car, Inc.
3000 K Street, NW
Suite 300
Washington, DC 20007

Edwin N. Lavergne
Darren L. Nunn
Ginsburg, Feldman and Bress, Chartered
Attorney for Bass Pro Shops
1250 Connecticut Avenue, NW
Washington, DC 20036

J. Kristen Liesemer
Director, Regulatory Matters
Unitel Communications, Inc.
200 Wellington Street West
Toronto, Ontario
MSV3G2
CANADA

Gary V. Pack
Senior Corporate Attorney
Service Merchandise
P.O. Box 24600
Nashville, TN 37202-4600

Jody B. Burton
Assistant General Counsel
Personal Property Division
General Services Administration
18th and F Streets, NW
Room 4002
Washington, DC 20405

Wayne V. Black
C. Douglas Jarrett
Keller and Heckman
Attorney for The American Petroleum
Institute
1001 G Street, NW
Suite 500 West
Washington, DC 20001

Douglas W. Kinkoph
Director, Regulatory/Legislative
Affairs
LCI International, Inc.
8180 Greensboro Drive
Suite 800
McLean, VA 22102

Cheryl A. Tritt
Joan E. Neal
Morrison & Foerster
Attorney for
Qwest Communications Corporation
2000 Pennsylvania Avenue, NW
Suite 5500
Washington, DC 20006

Lawrence F. Chesto
Director of Telecommunications
Systems
Aeronautical Radio, Inc.
2551 Riva Road
Annapolis, MD 21401

T. Michael Jankowski
Gregory M. Scott
Collier, Shannon, Rill & Scott
Attorneys for the American Car Rental
Association
3050 K Street, NW
Washington, DC 20007

Edwin N. Lavergne
Darren L. Nunn
Ginsburg, Feldman and Bress, Chartered
Attorneys for Promoline, Inc.
1250 Connecticut Avenue, NW
Washington, DC 20036

Pamela Sowar
David Cosson
National Telephone Cooperative
Association
2626 Pennsylvania Avenue, NW
Washington, DC 20037

Edwin N. Lavergne
Darren L. Nunn
Ginsburg, Feldman and Bress, Chartered
Attorneys for The Weather Channel, Inc.
1250 Connecticut Avenue, NW
Washington, DC 20036

Joseph Edward Page
4365 Executive Drive, #700
San Diego, CA 92121-2126

Albert Halprin
Melanie Haratunian
Halprin, Temple, Goodman & Sugrue
Attorneys for AVIS Rent A Car System,
Inc.
1100 New York Avenue, NW
Suite 650 East Tower
Washington, DC 20554

Richard C. Bartel, President
Communications Venture Services, Inc.
5526 Wisconsin Avenue
P.O. Box 70805
Chevy Chase, MD 20813-0805

Charles C. Hunter
Kevin S. DiLallo
Hunter & Mow, P.C.
Attorneys for Telecommunications
Resellers Association
1620 I Street, NW
Suite 701
Washington, DC 20006

M. Robert Sutherland
Richard M. Sbaratta
Helen A. Shockey
Attorneys for Bellsouth
Telecommunications, Inc.
4300 Southern Bell Center
675 West Peachtree Street, NE
Atlanta, GA 30375`

Mark C. Rosenblum
Peter H. Jacoby
Judy Sello
Attorneys for AT&T Corporation
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Leon M. Kestenbaum
Jay C. Keithly
Norina T. Moy
Sprint Corporation
1850 M Street, NW
Suite 1110
Washington, DC 20036

Lucille M. Mates
Sarah Rubenstein
Attorneys for Pacific Bell and Nevada
Bell
140 New Montgomery Street
Room 1522A
San Francisco, CA 94105

James L. Wurtz
Margaret E. Garber
Attorneys for Pacific Bell and Nevada
Bell
1275 Pennsylvania Avenue, NW
Washington, DC 20004

John M. Goodman
Attorney for Bell Atlantic Telephone
Companies
1133 20th Street, NW
Washington, DC 20036

Judith St. Ledger-Roty
Lee A. Rau
Reed, Smith, Shaw & McClay
Attorneys for Paging Network, Inc.
1301 K Street, NW
Suite 1100 East Tower
Washington, DC 20005

Gregory L. Cannon
Attorney for US West Communications,
Inc.
1020 19th Street, NW
Suite 700
Washington, DC 20036

David J. Gudino
Attorney for GTE Service Corporation
1850 M Street, NW
Suite 1200
Washington, DC 20036

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chartered
Attorneys for MFS Communications
Company, Inc.
3000 K Street, NW
Washington, DC 20007

David R. Poe
Leboeuf, Lamb, Greene & MacRae, L.L.P.
Attorney for Time Warner
Communications Holdings, Inc.
1875 Connecticut Avenue, NW
Suite 1200
Washington, DC 20009

William J. Balcerski
Attorney for NYNEX Telephone
Companies
1111 Westchester Avenue
White Plains, NY 10604

Eugene J. Baldrate
Director - Federal Regulatory
The Southern New England Telephone
Company
227 Church Street
New Haven, CT 06506

Mark D. Olson
410 W. Badillo Street
2nd Floor
Covina, CA 91723

Robert M. Lynch
Durward D. Dupre
J. Paul Walters, Jr.
Attorneys for Southwestern Bell
Telephone Company
One Bell Center
Room 3520
St. Louis, Missouri 63101

Roy L. Morris, Director
Allnet Communication Services, Inc.
1990 M Street, NW
Suite 500
Washington, DC 20036

Susan M. Miller
Vice President and General Counsel
Alliance for Telecommunications
Industry Solutions
1200 G Street, NW
Suite 500
Washington, DC 20005

Lu Ann S. Handy
Telecommunications Administrator
Ingersoll-Rand Company
800-D Beaty Street
P.O. Box 1840
Davidson, NC 28036

Doug Hicks
1607 Pinellas Road
Belleair, FL 34616

Jane R. Murphy
Controller
Philbrick's Sports Store
161 Portland Avenue
Dover, NH 03820

Barbara Fliszar
Manager, Customer Communications
Department
Del Webb Corporation
8001 North 24th Street
Phoenix, AZ 85016

Orest R. Flume
Senior Director- Network Services
Nabisco
7 Campus Drive
P.O. Box 311
Parsippany, NJ 07054-0311

John R. Gillen, President
Telemark Sales, Inc.
526 W. Wisconsin Avenue
Appleton, WI 54911

Richard Grigorian
South Windsor Arena & Sports Complex
585 John Fitch Blvd., Route 5
South Windsor, CT 06074

Tracey T. Powell
Chairman & CEO
Home Access Health Corporation
2401 West Hassell Road
Suite 1510
Hoffman Estates, IL 60195

G. Murray Greer
Greer Marketing Group
19412 Pompano Lane
Suite 111
Huntington Beach, CA 92648-6420

Charlie Swan
Industrial Packing, Inc.
P.O. Drawer N
River Road
Bucksport, Maine 04416

Janice DuBose
Trench Shoring Services
6770 East 56th Avenue
Commerce City, CO 80022

William E. Carpenter, Jr.
Heartland Express
2777 Heartland Drive
Coralville, Iowa 52241

Pat Todia
Director of Sales Training
Oceans Eleven
2025 South Atlantic Avenue
Daytona Beach Shores, FL 32118

Ed Leer
Vice President, Corporate Network
The Associated Group
1099 N. Meridian Street
Suite 1100
Indianapolis, IN 46204

Gerald M. Syberg
Telecommunications Technician
National General Insurance Company
One National General Plaza
P.O. Box 66937
St. Louis, MO 63166-6937

Ronald L. Sargent
President, Contract & Commercial
Staples, Inc.
8 Technology Drive
Suite 200
Westborough, MA 01581

Rick Sellers, President
The Huntington Service Company
P.O. Box 1558
Columbus, Ohio 43216

Kathleen Ritchie
Corporate Telecommunications
Consultant
Avery Dennison Corporation
One Clarks Hill
Framingham, MA 01701-8164

Michael Singh
Operations Manager
Lifescan, Inc.
1000 Gibraltar Drive
Milpitas, CA 95035-6312

R.D. Goodman
Chief Executive Officer
Applied Anogromics, Inc.
P.O. Box 9035
Santa Rosa, CA 95405

Richard G. Miller
Vice President and Chief Information
Officer
Mueller Industries, Inc.
2959 N. Rock Road
Wichita, KS 67273-9761

Murray D. Ryan
Director, Telecommunication Services
John Hopkins University
Office of Administrative Computing
Nichols House B5
3400 N. Charles Street
Baltimore, MD 21218-2690

Bruce J. Shulman
Chief Executive Officer
1-800-Budget Getaways
5728 Major Blvd
Suite 200
Orlando, FL 32819

Michael Lammers
Marketing Manager
Noritsu America Corporation
6900 Noritsu Avenue
Buena Park, CA 90622-5039

Katie Jenkins
The Loewen Group, Inc.
Telecommunications Department
8th Floor
50 E. Rivercenter Blvd.
Covington, KY 41011

Leon Dozois
Zachary Software, Inc.
106 Access Road
Norwood, MA 02062

Mick Haney
Technical Analyst III
Telecommunications Services
Hallmark Cards
2501 McGee, MD #533
Kansas City, MO 64108

Thomas C. Lonsbury
Manager, Voice Communications
Roadway Information Technology, Inc.
1077 Gorge Blvd.
P.O. Box 3558
Akron, OH 44309-3558

Edna C. Bobbitt
354 El Arbol Drive
Bellvue, CO 80512-6319

Mr. Robert R. Duguay
Fruit Baskets Unlimited
P.O. Box 88
141 South Main Street
Beacon Falls, CT 06403

Robert Johnson
First Digital
5627 Sepulveda Blvd.
Suite 213
Van Nuys, CA 91411